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BY ECF

March 2, 2020

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK
U.S.D.J. 3/4/2021

Counsel is directed to include in her submission
defendants' updated medical report in light of the
COVID-19 vaccine rollout within the BOP.

Re: *United States v. Duane Martinez* 17-cr-00219

Dear Judge Broderick:

I am appointed counsel for Duane Martinez. I write this letter to respectfully that Mr. Martinez be permitted to submit his Supplement to his Compassionate Release Motion by April 15, 2021.

Counsel was diagnosed with cancer in December and underwent surgery on December 22nd and finished her last radiation treatment on Friday, February 26th. Counsel had hoped to file her supplements before her surgery but was unable to do so as the surgery was moved up.

Counsel had expected to get her filings in sooner despite her medical situation; however, her sister was also diagnosed with cancer the same week she was and was the primary care provider for their mother who has Alzheimers. As a result, Counsel has been taking care of her mother and undergoing her treatments and overestimated her ability to get this work done during her treatments.

Counsel will be taking her mother back to Wyoming next week and will return on the 22nd and requests permission to file her Supplement by April 15, 2021. In the meantime, she is endeavoring to complete her submission before that if possible but asks that she be permitted until April 15, 2021 so that no action is taking on the pending motion until she has had the opportunity to supplement.

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For other good and just cause.

Respectfully submitted,

/s/ Inga L. Parsons

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Cc: All counsel of record via ECF